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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

**IN RE:**

**CASE: 19-22674**

JOSHUA WILLIAM JOHNSON

**Hon. JOEL T. MARKER**

**Debtor**

Confirmation Hearing: June 25, 2019 10:00 am

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**TRUSTEE'S OBJECTION TO EXEMPTION**

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Pursuant to Fed. R. Bankr. P. 4003(b), Lon A. Jenkins, Standing Chapter 13 Trustee, hereby objects to the exemption(s) claimed in Schedule C on the following grounds:

1. The Debtors filed their Chapter 13 petition for relief on April 18, 2019, and the First Meeting of Creditors under § 341 was held on May 24, 2019.
2. The Debtor's Schedule A/B lists an interest in air compressors, nail guns, saws, concrete saw, rebar cutter, concrete finishing tools valued at \$500 (hereinafter the "Tools").
3. As set forth on the Debtor's Schedule I, the Debtor is employed as an assistant coach.
4. On Schedule C, the Debtor claims an exemption of \$500 in the Tools under Utah Code Ann. § 78B-5-506(2).

5. Utah Code Ann. § 78B-5-506(2) provides that “an individual is entitled to an exemption, not exceeding \$5,000 in aggregate value, of implements, professional books, or tools of the individual’s trade, including motor vehicles to which no other exemptions has been applied, and *that are* actually used by the individual in the individual's principal business, trade, or profession.” (Emphasis added).

6. The Trustee objects to this exemption because the Tools do not appear to be associated with the Debtor's principal business, trade, or profession.

WHEREFORE, the Trustee objects to the Debtors' exemption claimed as stated above. The Trustee hereby objects to confirmation of the Debtors' plan unless the Debtors amend Schedule C to resolve this objection or file a response to this objection.

Dated: May 28, 2019

/s/ Tami Gadd-Willardson  
Attorney for Chapter 13 Trustee

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing Trustee's Objection to Exemption(s) was served on the following parties on May 28, 2019:

LEE J. DAVIS, ESQ., ECF Notification

JOSHUA WILLIAM JOHNSON, 10328 S. SPRINGCREST LANE  
SOUTH JORDAN, UT 84095

/s/ Michelle Moses